

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

MEDICAL PROPERTIES TRUST, INC.,

Plaintiff,

-v.-

VICEROY RESEARCH LLC; FRASER  
JOHN PERRING; GABRIEL BERNARDE;  
and AIDAN LAU,

Defendants.

Civil Action No. 2:23-cv-00408-RDP

**JOINT MOTION FOR  
MODIFICATION OF SCHEDULING ORDER**

On July 27, 2023, the Court entered a Scheduling Order that provided that Plaintiff Medical Properties Trust, Inc. (“MPT”) would submit expert report(s) on January 31, 2024; that all discovery would end May 15, 2024, with dispositive motions due June 28, 2024; and that the case would be trial ready in December 2024. (Doc. 64, ¶¶ 2, 7, 10, 14). The parties are currently engaged in document discovery, which they anticipate may take another two months to complete. In light of the current stage of document discovery, the parties have met and conferred regarding modifications to the Scheduling Order to ensure sufficient time to complete all remaining discovery in an orderly fashion. The parties thus jointly request that the Court modify and supplement the Scheduling Order by entering the proposed Order attached as Exhibit A hereto. The proposed Order reflects a three-month extension to the trial ready date, with corresponding adjustments to discovery and briefing deadlines, the addition of interim document and fact discovery deadlines, and a provision for rebuttal expert reports if necessary.

Dated: December 7, 2023

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Dated: December 7, 2023

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will give notice of such filing to all counsel of record.

/s/ Wesley B. Gilchrist  
Of Counsel